



Federal Regulatory Affairs

2300 N St. NW, Suite 710 Washington DC 20037

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March 8, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *Implementation of Section 224 of the Act*, WC Dkt. No. 07-245; *A National Broadband Plan for Our Future*, GN Docket No. 09-51

Dear Ms. Dortch:

On March 7, 2011, Jennie Chandra, Senior Counsel, Federal Policy, Windstream Communications, Greg Brubaker, Senior Consultant—Engineering, Frontier Communications and the undersigned for Frontier Communications met with Zac Katz, Legal Advisor for Wireline Communications, International and Internet Issues to Chairman Genachowski, Sharon Gillett, Chief of the Wireline Competition Bureau, and Richard Kwiatkowski, Al Lewis, Marcus Maher and Christi Shewman of the Wireline Competition Bureau regarding the above-reference proceedings.

Frontier and Windstream explained that the traditional balance presumed for pole attachment joint use agreements between ILECs and utilities is no longer applicable as utilities now control a significantly higher percentage of poles than ILECs. Because there is no longer parity in the relationship, utilities have gained significant leverage in joint use agreements that they have used to dramatically increase the pole attachment rates for ILECs. These increased rates for pole attachments make it even more difficult for ILECs to deploy and operate broadband networks in rural areas, and place ILECs at a competitive disadvantage to cable companies and CLECs in the broadband marketplace. Frontier and Windstream urged the Commission to correct the competitive inequities in pole attachment rates by ensuring that rates for all broadband attachers are uniformly low, in line with the goals of the National Broadband Plan. The attached presentation illustrated these points.

Please feel free to contact me with any further questions.

Sincerely,

/s/

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs

Frontier Communications
(203) 614-4702

Cc: Zac Katz
Sharon Gillett
Richard Kwiatkowski
Al Lewis
Marcus Maher
Christi Shewman